

Exhibit 32

Roylyn J. Wright

From: Geyer, Kate <KGeyer@ktslaw.com>
Sent: Monday, February 17, 2025 5:39 PM
To: Paige Stradley; Damitio, Chris; Eric R. Chad; Eric W. Schweibenz; Donald McPhail; Shannon Maney; RothschildMGTeam; matthew@dclglawyers.com
Cc: Machleidt, Dario
Subject: RE: Valve v. Rothschild - 2:23-1016-JNW - Tomorrow's meet and confer

CAUTION - External.

Paige –

We disagree that third-party discovery will occur after party discovery is substantially complete, **regardless of the particular date that occurs**. The Court has entered a scheduling order that Defendants must comply with, and Defendants cannot use their own failure to timely engage in discovery, as we have documented in numerous communications, to push off third party discovery indefinitely. Valve will complete all third-party discovery by June 25, 2025 as required by the Court. Dkt. 61 at 2. Valve will agree that discovery from the subpoenaed law firms will occur after April 25, 2025, when Defendants' document production must be substantially complete. *Id.* Valve will expect those parties to meet and confer prior to April 25, 2025 to resolve any remaining objections to the subpoenas. If necessary, Valve reserves all rights to seek Court intervention to ensure that Defendants meet their obligations under the scheduling order such that third party discovery can be timely completed.

Kate Geyer

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From: Paige Stradley <PStradley@MerchantGould.com>
Sent: Wednesday, February 12, 2025 2:56 PM
To: Damitio, Chris <CDamitio@ktslaw.com>; Eric R. Chad <EChad@merchantgould.com>; Eric W. Schweibenz <eschweibenz@merchantgould.com>; Donald McPhail <dmcphail@merchantgould.com>; Shannon Maney <SManey@MerchantGould.com>; RothschildMGTeam <RothschildMGTeam@MerchantGould.com>; matthew@dclglawyers.com
Cc: Machleidt, Dario <dmachleidt@ktslaw.com>; Geyer, Kate <KGeyer@ktslaw.com>
Subject: RE: Valve v. Rothschild - 2:23-1016-JNW - Tomorrow's meet and confer

Chris,

That is fine with us. Just to make sure the parties are on the same page, however, our understanding is that the parties will address third-party discovery after party discovery is substantially complete, regardless of the particular date that occurs. Please let us know if Valve disagrees with this understanding.

After you've reviewed, please let us know when you'd like to talk next week. Best,
Paige

Paige Stradley
she/her/hers
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Operating as Merchant & Gould, LLP, in California.

Please consider the environment before printing this email. Thank you.

From: Damitio, Chris <CDamitio@ktslaw.com>

Sent: Wednesday, February 12, 2025 3:28 PM

To: Paige Stradley <PStradley@MerchantGould.com>; Eric R. Chad <EChad@merchantgould.com>; Eric W. Schweibenz <eschweibenz@merchantgould.com>; Donald McPhail <dmcpfail@merchantgould.com>; Shannon Maney <SManey@MerchantGould.com>; RothschildMGTeam <RothschildMGTeam@MerchantGould.com>; matthew@dclglawyers.com

Cc: Machleidt, Dario <dmachleidt@ktslaw.com>; Geyer, Kate <KGeyer@ktslaw.com>

Subject: Valve v. Rothschild - 2:23-1016-JNW - Tomorrow's meet and confer

CAUTION - External.

Counsel,

Valve intends to cancel tomorrow's meet and confer. We will follow up next week once we have had a chance to review Defendants' document production.

Many thanks,
Chris



Chris Damitio

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